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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of	)	
	)	
Revision of the Commission's Rules	)	CC Docket No. 94-102
to Ensure Compatibility with Enhanced	)	
E911 Emergency Calling Systems	)	
	)	

To: The Commission

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Carrier Report of Texas RSA 7 B3, Inc. Regarding
Implementation of Wireless E911 Phase II Automatic Location Identification

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Texas RSA 7 B3, Inc. d/b/a Peoples Cellular ("Peoples") hereby submits a report regarding implementation of wireless E911 Phase II Automatic Location Identification ("ALI"), in compliance with the Federal Communications Commission's ("FCC" or "Commission") Further Memorandum Opinion and Order in the above-captioned proceeding.

I.   Background / Contact Information

Peoples serves rural Texas and its contact information is as follows:

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Wireless Manager

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II.   E911 Phase II Location Technology Information

Peoples has chosen a network-based solution for its Phase II ALI technology. Network-based location technology uses a locating function within or as an overlay to the wireless network infrastructure using Time Difference of Arrival, Angle of Arrival, Location Pattern Matching, or a combination thereof. While leaning toward Nortel, Peoples is still undecided at this point regarding a vendor, but plans to select a product

that is available and proven to work within the time frame necessary for Peoples to achieve Phase II implementation in compliance with the Commission's rules.[1]

Peoples is examining both switch-based and cell site-based solutions. Peoples has yet to be provided any meaningful technical or pricing information on the Nortel switch-based solution. Peoples is examining site-based products ranging in price from approximately $25,000 to $45,000 per cell site to provide Phase II ALI capability. As a small company, Peoples would incur a significant cost to upgrade to Phase II capability using site-based technology. Whether a switch-based solution will cost more or less remains to be seen until Nortel releases its pricing information.[2]

Regardless of which solution Peoples selects, it intends to deploy the solution throughout its service area.

III.   Testing and Verification

Peoples has yet to test any ALI solutions since it is still comparing products. Peoples anticipates using a combination of Empirical Testing Methods and Predictive Testing Methods along with drive tests to gauge the accuracy of the network-based technology it eventually chooses.

IV.   Implementation Details and Schedule

Peoples is still awaiting product availability from its vendors before it can develop an implementation schedule and compare switch-based products to site-based products. Peoples will continue to evaluate ALI solutions and intends to select and deploy a technology after the first quarter of 2001. Peoples will accelerate this schedule to the extent necessary upon receipt of a PSAP request.

V.   PSAP Interface

Peoples has yet to receive a Phase II PSAP request. To develop a network-based system, Peoples expects to overlay its existing towers and MTSOs with its chosen vendor

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[1] Peoples has been researching many different Phase II vendors and their potential product offerings. These companies include Nortel, Lucent, SCC Communications, Technocom Corporation, GTE Telecommunications Services, Cell-Loc, True Position, US Wireless, and SigmaOne Communications Corporation.

[2] While the public interest of providing Phase II capability overrides most cost concerns, a small company like Peoples must search for an economically feasible solution. Peoples notes that the opportunities for cost recovery in rural Texas by marketing ALI capabilities are not as prevalent as such opportunities in urban areas.

location equipment in order to transmit Phase II data to PSAPs.[3] However, many of the details remain up to the PSAP.

VI.   Other Information

Peoples notes that the remote and rural nature of its service territory in Texas can present additional and unforeseen problems when installing and testing location technology. Peoples would have a much better handle on how it will eventually implement its Phase II plan if the vendor products were available for testing. Unfortunately, Peoples's Phase II implementation plan depends, in large part, upon the schedules and plans of the vendors.

November 9, 2000

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[3] In general, the following hardware and software is needed to transmit Phase II data to PSAPs: IS41C – Dialed Number Trigger, E911 Software, MPC – Mobile Positioning Center, PDE – Position Determining Entity, and receivers at each cell site.